

COMMONWEALTH OF MASSACHUSETTS
Department of Telecommunications and Energy

**RESPONSE OF THE ATTORNEY GENERAL TO THE
SECOND SET OF INFORMATION REQUESTS FROM THE
BAY STATE GAS COMPANY
DTE 05-27**

Dated: August 2, 2005

Responsible Party: Jon Cavallo

BSG-AG-2-36 Please refer to the Cavallo Testimony at p. 15, lines 8-12. (a) Has Mr. Cavallo conducted a “root cause analysis” of the cause of the “pinpoint” leaks in Bay State’s bare steel and unprotected coated steel mains? (b) Provide such analysis. (c) If no such analysis exists, please describe the sources of pinpoint leaks analyzed other than “the poor quality of the bedding and backfill,” and describe why Mr. Cavallo rejected them as the root cause of the leaks.

Response: Mr. Cavallo has provided his opinion of the probable cause of the pinpoint leaks based on his field observations, experience with corrosion’s impact on steel and judgment, as more fully explained on lines 14 –23 on p. 15, and lines 1 –17 on p. 16 of his prefiled testimony. As a condition of the field examination, the Company did not permit destructive testing of pipe material, like the removal of a sample of the pipe, for further analysis which would have been a typical part of a formal root cause analysis.

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